

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

**KIERAN RAVI BHATTACHARYA,**

**Plaintiff,**

**V.**

**Civil Action No.: 3:19-CV-00054**

**JAMES B. MURRAY, JR., et. al.,**

**Defendants.**

**PLAINTIFF'S MOTION TO SEAL EXHIBIT A TO  
PLAINTIFF'S RESPONSE TO MOTION TO QUASH FLEMING SUBPOENA**

Plaintiff Kieran Ravi Bhattacharya (“Mr. Bhattacharya”), by counsel, respectfully moves to seal Exhibit A to Plaintiff’s Response to Motion to Quash Fleming Subpoena (Dkt. #186).

Exhibit A is a document produced by Defendants in discovery that consists of an email chain among University of Virginia administrative personnel, including Evelyn R. Fleming, members of the Threat Assessment Team, and the Associate Dean of Students. The email contains private information about Mr. Bhattacharya's academic and medical history, sensitive information from Mr. Bhattacharya's ex-girlfriend, Angel Hsu, and disciplinary measures explored by UVA. When produced to Mr. Bhattacharya, the email was designated by Defendants as highly confidential, pursuant to the Stipulated Protective Order entered in this matter. (Dkt #150). Alternatives to sealing are not possible here given the nature of the Stipulated Protective Order, which by its terms limits access to highly confidential documents to attorneys, attorneys' clerical employees and support staff, experts, witnesses, court personnel, or others only upon two-party consent. *See* Stipulated Protective Order (Dkt #150) at 8-9. Sealing is requested indefinitely, due

to the sensitive nature of the contents of Exhibit A and the requirements of the Stipulated Protective Order entered by this Court.

Date: September 10, 2021

Respectfully submitted,

KIERAN RAVI BHATTACHARYA

By: s/ Michael J. Lockerby  
Counsel

Michael J. Lockerby (VSB No. 24003)  
FOLEY & LARDNER LLP  
Washington Harbour  
3000 K Street, N.W., Suite 600  
Washington, D.C. 20007-5109  
Telephone: (202) 672-5300  
Facsimile: (202) 672-5399  
Email: [mlockerby@foley.com](mailto:mlockerby@foley.com)

*Counsel for Plaintiff, Kieran Ravi Bhattacharya*